

18 U.S.C. § 1956(a)(1)(A)(ii)
Laundering of Monetary Instruments

IN THE DISTRICT COURT OF THE UNITED STATES
 FOR THE _____ DISTRICT OF _____

UNITED STATES OF AMERICA)		
)		
v.)	No.	_____
)		18 U.S.C., Secs. 1956(a)(1)(A)(ii)
_____)		and 2
)		

The grand jury charges:

On or about [***Date***], in the _____ District of _____, [***Defendant(s) Name(s)***] did knowingly and willfully conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, [***Description of Financial Transaction***], which involved the proceeds of a specified unlawful activity, that is [***Describe Specified Unlawful Activity***], with the intent to engage in conduct constituting a violation of [26 U.S.C. § 7201] [26 U.S.C. § 7206] **1** to wit, [***Describe Conduct***] and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is [***Funds***] **2** [***Monetary Instruments***] **3** in the amount of \$_____, represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(ii) and 2.

A True Bill.

 Foreperson

 United States Attorney

NOTES

- 1 Choose one or both. If both are used, set forth in the conjunctive.
- 2 Select one. Remember monetary instrument is a defined term in 1956(c)(5) whereas "funds" is undefined.
- 3 If the activity described in this paragraph is intended to cover more than one count this last phrase can be redrafted in tabular form as follows: "That is, [*Funds*], [*Monetary Instruments*] in the amounts set forth below:

<u>Count</u>	<u>Approximate Dollar Amounts</u>
I.	\$ _____
II.	\$ _____
III.	\$ _____